

**REMARKS**

This is a Reply to the Office Action dated January 26, 2005. Claims 1, 4-14, 17-27 and 30-44 are pending in the above-referenced patent application. All of the claims were rejected. Claims 1, 6-14, 19-27 and 32-44 were rejected under 35 USC 102(e) as being anticipated by USPN 5,887,193 to Takahashi et al. ("Takahashi"). Claims 4, 5, 17, 18, 30 and 31 were rejected under 35 USC 103(a) as being unpatentable over Takahashi in view of USPN 6,466,233 to Mitani.

**Rejection of Claims Under 35 U.S.C. 102(e)**

Rejection of Claims 1, 6-14, 19-27 and 32-44 under 35 USC 102(e) as being anticipated by Takahashi is respectfully traversed because Takahashi does not disclose all of the limitations of the claims.

At the outset, Applicants wish to point out that in the interest of clarity, an outline of the crux of Takahashi's disclosure is provided first. This outline is relied on by Applicants in the detailed arguments further below. Applicants respectfully request that if the claims are once again rejected, the Examiner respond to this outline with particularity.

**1. Takahashi's system for loading control information from peripheral devices which are represented as objects to a controller in a predetermined format in response to connection operation**

**a. Control System**

Referring to Takahashi's disclosure, Takahashi is specifically directed to a control system which comprises a plurality of peripheral devices represented as objects, and a controller connectable to the plurality of peripheral devices via a common communication line for unitarily controlling the plurality of peripheral devices (Takahashi , col. 1, lines 59-65).

**b. Controller and Object Data in Peripheral Devices**

The controller is for unitarily controlling the plurality of peripheral devices via a common communication line. Object data about control of a function of each of the plurality of peripheral devices is stored in a respective one of the plurality of peripheral devices in advance (col. 2, lines 20-30).

**c. Transfer of Object Data from a Peripheral Device to the Controller**

When connected to an arbitrary peripheral device, the controller loads the object data from the arbitrary peripheral device. The controller forms an object corresponding to the peripheral device and also to display under control of the controller a manipulation picture for manipulating the peripheral device on the basis of the object data. The controller outputs an

instruction to the communication line via the object in accordance with a manipulation based on the manipulation picture displayed on the controller, and controls the peripheral device (Takahashi, col. 2, lines 30-42).

This makes it possible to transparently use multimedia devices in a common manner through a multimedia controller via a LAN without the need for special software such as application software or a device driver (Takahashi, col. 2, lines 43-47).

#### **d. Control of Objects by the Controller**

The individual objects, which are managed by the controller, have the functions of sending their own functions and control means to the controller. Therefore, there is no need to prepare a control program in the controller, and it is possible to achieve control only by connecting the objects to the controller (Takahashi, col. 6, lines 1-6).

#### **e. Delegate Object Description File of a Peripheral Device**

Reference numeral 1061 (Fig. 7) denotes a multimedia device (peripheral device) delegate object description file which describes the specifications of a multimedia device delegate object generated in the multimedia controller 1 when the multimedia device 2 is connected to the multimedia controller 1 via the LAN 4. The multimedia device delegate object description file 1061 includes a multimedia device control panel object description part 1062 which describes the specifications of a manipulation panel for the multimedia device 2 and a data

input/output delegate object description part 1063 which describes the specifications of a data input/output delegate object which serves as a delegate to input or output data to or from the multimedia device 2. The multimedia device control panel object description part 1062 realizes the function of a GUI description language which describes a control panel to be used for manipulating the multimedia device 2 through a GUI (Takahashi, col. 9, line 60 to col. 10, line 9).

#### **f. Delegate Object Generated in the Controller**

FIG. 8 is a view showing a state in which the multimedia device 2 is connected to the LAN 4. Referring to FIG. 8, a multimedia device delegate object 1068 is generated in the multimedia controller 1 and functions as the delegate of the multimedia device 2 in the multimedia controller 1. The multimedia device delegate object 1068 includes a multimedia device control panel object 1069 which functions as a control panel of the multimedia device 2, a multimedia device data input delegate object 1070 which functions as the delegate of the multimedia device data input object 1066 during inputting of data, and a multimedia device data output delegate object 1071 which functions as the delegate of the multimedia device data output object 1067 (Takahashi, col. 10, lines 10-23).

**g. Delegate Object Description File of a Peripheral Device Is Transferred to The Controller**

In operation, when the multimedia device 2 is connected to the LAN 4, the system director object 205 reads the multimedia device delegate object description file 1061 by using the multimedia device delegate object generating means 1047, selects a class to which an object to be generated belongs, from the information described in the multimedia device delegate object description file 1061, and generates the multimedia device delegate object 1068 on the basis of the class definition part 1080 of the selected class in the class library 1086. (Takahashi, col. 11, lines 29-38).

**2. The Claimed Invention is Patentably Distinct From Takahashi**

Claim 1 includes the limitations of: “a user interface for controlling devices that are currently connected to a network, ... the user interface including at least one reference associated with the device information in each of said devices currently connected to the network ....”

Claim 1 includes the further limitation of : in response to selection of the reference displaying a control interface including device data using associated information of said device corresponding to the reference in the user interface.

As such, according to the claimed invention herein, a two stage process is utilized, as: (1) generating a top-level user interface that includes references to devices, and (2) upon selection of

a reference in the top-level user interface, using the reference to display a specific control interface for the device. This is different from Takahashi.

As the Sections 1(c) and 1(g) above lay out, as soon as a device is connected, Takahashi's controller transfers the device delegate object description file from the device and builds a control panel (see also col. 9, line 60 to col. 10, line 5; col. 11, lines 29-38). Takahashi does not generate a top-level user interface that includes a reference to device information of a device, wherein when later the device is selected from the top-level user interface, the reference is used to access the device information for building a control panel for the device. A two stage process is utilized by the present invention, wherein in stage 1 a top-level user interface is generated which includes a reference to a device, and in stage 2 when the device is selected from the top-level user interface, the reference is used to access the device information to build a control panel for the device. Takahashi teaches away from this limitation by transferring the device delegate object description file from a device to the controller and building a control panel, as soon as the device is connected to the controller.

As such, Takahashi does not disclose the step of generating a top-level user interface that has a reference to device information as claimed. Clearly then, Takahashi does not disclose the step of: in response to selection of the reference displaying a control interface including device data using associated information of said device corresponding to the reference in the user interface, as claimed.

Takahashi specifically states that by transferring the device delegate object description file to the controller and building a control panel as soon as the device is connected to the controller, it is possible to achieve control only by connecting the objects to the controller (Takahashi, col. 6, lines 1-6). By contrast, in stage 1 the claimed invention herein generates a top-level user interface which must be used by a user to select a device. Then, in stage 2, when the device is selected, the reference is used to access the device information to build a control panel for the device. Such limitations are totally missing from Takahashi.

If the claims are once again rejection, Applicants respectfully request that the Examiner specifically point to stage 1 and stage 2 teachings in Takahashi for this 35 USC 102(e) rejection.

### **3. Applicants Respectfully Traverse the Examiner's Interpretation of Takahashi**

In col. 17, line 57 to col. 18, line 7 (relied on by the Examiner), Takahashi does not disclose a method for providing a user interface for controlling devices that are currently connected to a network, the method comprising the steps of obtaining device information from devices currently connected to the network and generating a user interface based at least on the obtained information, the user interface including at least one reference associated with the device information in each of said devices currently connected to the network, as required by Claim 1. In that passage, Takahashi only mentions that: "As described above, in accordance with the above-described embodiment, only by connecting a multimedia device to a multimedia

controller via a LAN, the multimedia device delegate object required to manipulate the multimedia device is automatically generated in the multimedia controller. Further, the control panel required to manipulate the multimedia device is automatically displayed on the display picture of the multimedia controller, and if a user manipulates the control panel, an appropriate message is sent to a controller object of the multimedia device so that a desired manipulation can be performed. The information required to generate the multimedia device delegate object required to manipulate the multimedia device is obtained from a multimedia device delegate object description file read from the multimedia device. Accordingly, the multimedia controller needs only to have a basic class library, and does not need to have information about a specific multimedia device.”

There is no mention of generating a user interface based at least on the obtained information, the user interface including at least one reference associated with the device information in each of said devices currently connected to the network, as claimed. By contrast, in Takahashi, when a multimedia device is connected to the LAN, the controller obtains a device delegate object description file from the multimedia device to generate a device delegate object that provides a control panel.

Takahashi, FIG. 14 shows a state in which a digital VTR represented as an object has not yet been connected to the multimedia controller. Takahashi (col. 12, lines 27-53) explains that: “As shown in FIG. 14, reference numeral 203 denotes the digital VTR, and a digital, VTR object



206 is resident in the digital VTR 203 and functions as a digital VTR which is identified as an object by the other multimedia devices provided on the LAN 4. The digital VTR object 206 includes three objects. A digital VTR controller object 207 executes hardware control of the digital VTR 203.... The digital VTR delegate object description file 210 includes a digital VTR control panel object description part 211 which describes the specifications of a manipulation panel for the digital VTR 203 and a digital VTR data input/output delegate object description part 212 which describes the specifications of a digital VTR data input/output delegate object which serves as a delegate to input or output data to or from the digital VTR 203.”

Takahashi, FIG. 18 shows a state in which the digital VTR is connected to the LAN. Takahashi (col. 13, lines 23-35) explains that: “Referring to FIG. 18, a digital VTR delegate object 220 is generated in the multimedia controller 1 when the digital VTR 203 is connected to the LAN 4, and functions as the delegate of the digital VTR 203 in the multimedia controller 1. The digital VTR delegate object 220 includes a digital VTR control panel object 221 which functions as a control panel of the digital VTR 203, a digital VTR data input delegate object 222 which functions as the delegate of the digital VTR data input object 208 during inputting of data, and a digital VTR data output delegate object 223 which functions as the delegate of the digital VTR data output object 209.”

Takahashi then states that when the multimedia device is connected to the LAN, the controller obtains a device delegate object description file from the multimedia device to

generate a device delegate object that provides a control panel. Specifically, Takahashi (col. 13, line 36 to col. 14, line 27; FIGS. 16-21) explains that: "... the system director object 205 recognizes the connection to the digital VTR 203 .... Then, the system director object 205 loads the digital VTR delegate object description file 210 from the digital VTR 203 .... Then, the system director object 205 generates the digital VTR delegate object 220 in the multimedia controller 1 on the basis of the digital VTR delegate object description file 210 .... The resultant state of connection is shown in FIG. 18. Then, the digital VTR delegate object 220 displays the icon display 229 of the digital VTR 203 on the display picture 228 of the multimedia controller 1 .... Subsequently, the user can use the digital VTR 203 via the digital VTR delegate object 220 provided in the multimedia controller 1 by manipulating the digital VTR 203 on the basis of the manipulation picture displayed on the basis of the digital VTR control panel object 221 of the multimedia controller 1 .... FIG. 19 shows the icon display 229 to be displayed when the digital VTR 203 is connected to the LAN 4. FIG. 20 shows a default display picture graphically displayed by the digital VTR control panel object 221 .... FIG. 21 is a view showing the correspondence between the classes to which individual objects belong and the constituent elements of the digital VTR control panel object 221. The classes to which the respective basic constituent elements belong are defined in the class library 1081 (refer to FIG. 9) in advance, and are held in the multimedia controller 1."

Therefore, clearly, there is no mention of generating a user interface based at least on the obtained information, the user interface including at least one reference associated with the

device information in each of said devices currently connected to the network, as claimed. In Takahashi, when a multimedia device is connected to the LAN, the controller obtains a device delegate object description file from the multimedia device to generate a device delegate object that provides a control panel. The device delegate object does not generate a user interface that includes at least one reference associated with the device information in each of said devices currently connected to the network. The multimedia controller in Takahashi reads the device delegate object description file from the multimedia device once (FIG. 18) and then uses the transferred information in the controller to build a control panel. By contrast to the claimed invention, there is no reference from the transferred delegate object 220 in the controller 1 back to the delegate object description file 210 in the VTR device 203. Nor is there a need for such a reference because all the information needed to create the control panel for the VTR 203 is available to the controller 1 without need to refer back to the VTR 203.

This is clear because Takahashi states that: “FIG. 21 is a view showing the correspondence between the classes to which individual objects belong and the constituent elements of the digital VTR control panel object 221. The classes to which the respective basic constituent elements belong are defined in the class library 1081 (refer to FIG. 9) in advance, and are held in the multimedia controller 1” (col. 14, lines 18-17). However, in the claimed invention, first references are included in the user interface, wherein each reference refers to the user interface data of a device connected to the network. Then, the references are later used to obtain information from the corresponding devices to generate corresponding user interfaces.

Takahashi does not disclose that a user interface includes one or more references associated with the device information of one or more devices currently connected to the network, as required by Claim 1. Takahashi does not teach the concept of using references in the user interface, wherein the references provide access to information stored in devices connected to the network. As such, according to the claimed invention herein, rather than initially transferring the user interface data contained in each network device and storing each device's transferred user interface data in a controller, references are included in the user interface which refer to the user interface data of a device connected to the network. When the user interface data of a particular device is needed (e.g., for display to a user for command and control), then a reference in the general user interface, corresponding to that particular device, is used to access that particular device's control interface data for display to a user, allowing command/control of the particular device via that user interface.

Further, in col. 18, line 8 to col. 20, line 8 (or elsewhere) Takahashi does not disclose displaying a user interfaces on one or more devices connected to the network capable of displaying a user interface, for user control of said devices that are currently connected to the network, as required by Claim 1. In that passage, Takahashi explains how input and output objects 208, 209 are transferred from the VTR 203 to the controller 1 as objects 222 and 223, to generate provide input/output panels for the VTR 203, much the same way the control panel discussed above. By contrast, according to Claim 1 herein, user interfaces are generated

independently by several network devices such as network devices capable of displaying user interfaces. Then different user interfaces are displayed on different network devices. Generating a user interface in each such device rather than generating a central user interface, allows each such device to show its own device icon/text preferentially in its user interface.

Further, Takahashi does not disclose the steps of: displaying said user interface on one or more devices connected to the network capable of displaying a user interface, for user control of said devices that are currently connected to the network; and in response to selection of the reference, displaying a control interface including device data using associated information of said device corresponding to the reference in the user interface, as required by Claim 1.

The Patent Office has relied on Takahashi col. 18, line 8 to col. 20, line 8; and col. 17, line 57 to col. 18, line 7. However, as discussed above, Takahashi does not teach generating a user interface, nor generating a user interface including one or more references associated with the device information of one or more devices currently connected to the network. Neither in the above passage nor elsewhere, does Takahashi disclose using each reference in a user interface to access the associated information contained in a corresponding device to generate, and then display, a user control interface for that device. As noted, Takahashi mentions reading a delegate object description files from a multimedia device, and using the transferred file and a class library in a multimedia controller to generate a control panel. However, Takahashi does not

teach using a reference in a corresponding user interface to access the associated information in each device.

Further, Takahashi does not disclose that each multimedia device has device information contained in that device, wherein that device information is then accessed using references in a user interface that is generated in another device such as the multimedia controller. There is no reference to device information in Takahashi, inherent or otherwise, because the delegate object description file is read from the multimedia device by query, rather than via a reference (such as an address) pointer that provides direct access to such information in individual devices. Therefore, for at least these reasons, rejection of Claim 1, and all claims dependent therefrom, should be withdrawn.

**As per Claim 6**, for the above reasons, Takahashi does not disclose connecting a client device to the network capable of displaying a user interface, and displaying a user interface on the client device for controlling devices that are currently connected to the network, as required by Claim 6. Further, Takahashi is directed to a control system comprising a plurality of peripheral devices represented as objects, and a controller connectable to the plurality of peripheral devices via a common communication line for unitarily controlling the plurality of peripheral devices. The controller is arranged to be connected to an arbitrary number of peripheral devices selected from among the plurality of peripheral devices, read control information stored in the arbitrary number of peripheral devices via the communication line into

a predetermined memory area of the controller in a predetermined format so that the controller can control the arbitrary number of peripheral devices (Abstract). As such, only the controller device can perform displaying a controller panel. The controller device is statically programmed as a dedicated machine for display of control panels. Whereas, the claimed invention provides for connecting at least one client device to the network capable of displaying a user interface and displaying a user interface on the client device, for controlling devices that are currently connected to the network.

Despite the Patent Office's characterization, from the above passage it is clear that in Takahashi's example, when a new device (e.g., multimedia device) is connected to the network, a user interface for the new device cannot be displayed on the newly connected device itself. By contrast, Claim 6 herein provides connecting a client device to the network capable of displaying a user interface, and the displaying a user interface on the client device. Further, Takahashi does not disclose displaying a user interface based on obtained device information, for controlling devices that are currently connected to the network, as required by Claim 6. If the Patent Office disagrees, Applicants respectfully request that the Patent Office set forth detailed reasoning and support therefore. As such, for at these reasons, and reasons provided above in relation to Claims 1-2, rejection of Claim 6 should be withdrawn.

**As per Claim 7**, it was rejected for similar reasons as rejection of Claims 1 and 2. For reasons described above, Takahashi does not disclose that the device information in each device

further includes a user control interface description for user interaction with the device, and upon detecting user selection of a device from one of said user interfaces, accessing and then displaying the control interface description in the corresponding device for user command and control of the device, as required by Claim 7. As such, rejection of Claim 7 should be withdrawn.

**As per Claim 8**, it was rejected for similar reasons as rejection of Claims 1 and 2. For reasons described above, Takahashi does not disclose generating each user interface such that the reference in that user interface description provides access to at least the information in each corresponding device, as required by Claim 8. As such, rejection of Claim 8 should be withdrawn.

**As per Claim 9**, it was rejected for similar reasons as rejection of Claims 1 and 2. For reasons described above, Takahashi does not disclose generating each user interface such that the user interface further includes device data corresponding to each device based on the information obtained from each device, as required by Claim 9. As such, rejection of Claim 9 should be withdrawn.

**As per Claim 10**, Takahashi (col. 34, lines 62-67, relied upon by the Patent Office), does not disclose that the device information in each device includes device identification information. Indeed, in that passage, Takahashi states that the controller assigns IDs to the multimedia



devices, and certainly there is no mention of device identification information as claimed herein. Therefore, for at least these reasons, and the reasons provided above, rejection of Claim 10 should be withdrawn.

**As per Claim 11**, it was rejected for similar reasons as rejection of Claims 1 and 2. For reasons described above, Takahashi does not disclose that the device information in each device includes a user control interface description for user interaction with the device, as required by Claim 11. Further, as discussed, Takahashi does not disclose the steps of generating any type of user interface according to the claimed invention. Therefore, for at least these reasons, and the reasons provided above, rejection of Claim 11 should be withdrawn.

**As per Claim 12**, it was rejected for similar reasons as rejection of Claims 1 and 2. For reasons described above, Takahashi does not disclose generating each user interface such that each reference in the user interface provides access to at least the user control interface description in each corresponding device, detecting user selection of a device from one of said user interfaces, and using a reference in the user interface of the selected device to access the control interface description in the device and then display the control interface description as a control user interface for user command and control of the device, as required by Claim 12. Therefore, for at least these reasons, and the reasons provided above, rejection of Claim 12 should be withdrawn.

**As per Claim 13**, as discussed above, in col. 13, lines 36-64 (relied upon by the Patent Office) Takahashi does not disclose generating the user interface such that the user interface further includes device data corresponding to each device based on the information obtained from each device, the device data providing references to the user control interface description in each device, providing access to control interface description in the corresponding device, as required by Claim 13. As discussed, there is no user interface including references to device information generated in Takahashi. Therefore, for at least these reasons, and the reasons provided above, rejection of Claim 13 should be withdrawn.

**Claim 14** was rejected for substantially the same reasons that the rejection of Claim 1. The rejection of Claim 14 is respectfully traversed for the reasons given above in relation to Claim 1 and in light of amendments to Claim 14. Further, Applicant believes that Takahashi does not disclose an agent in a device for obtaining information and generating a user interface as required by Claim 14. Therefore, for at least these reasons, rejection of Claim 14, and all claims dependent therefrom, should be withdrawn.

**Claims 19, 20, 21, 22, 23, 24, 25 and 26** were rejected for substantially the same reasons as rejection of Claims 6, 7, 8, 9, 10, 11, 12 and 13. The rejections are respectfully traversed for the reasons given above in relation to Claims 1, 6, 7, 8, 9, 10, 11, 12 and 13. Further, Takahashi does not disclose use of agents as claimed. Therefore, the rejections should be withdrawn.

**Claim 27** was rejected for substantially the same reasons that the rejection of Claim 1. The rejection of Claim 27 is respectfully traversed for the reasons given above in relation to Claim 1 in light of amendments to Claim 27. Further, Applicant believes that Takahashi does not disclose an agent in multiple devices for obtaining information and generating a user interface as required by Claim 27. Therefore, for at least these reasons, rejection of Claim 27, and all claims dependent therefrom, should be withdrawn.

**Claim 41** was rejected for essentially the same reasons as Claim 1 and should therefore be allowed for at least the reasons provided in relation to Claim 1.

**Claims 32, 33, 34, 35, 36, 37, 38 and 39** were rejected for substantially the same reasons as rejection of Claims 19, 20, 22, 23, 24, 25 and 26. The rejections are respectfully traversed for the reasons given above in relation to Claims 14, 19, 20, 22, 23, 24, 25 and 26. Therefore, rejections should be withdrawn.

**Claims 40, 42, 43 and 44** were rejected for essentially the same reasons as rejection of Claims 1 and 7, and should therefore be allowed for at least the reasons provided in relation to Claims 1 and 7.

**Rejection of Claims Under 35 U.S.C. 103 (a)**

Rejection of Claims 4, 5, 17, 18, 30 and 31 under 35 USC 103(a) as being unpatentable

over Takahashi in view of Mitani is respectfully traversed because the references, alone or in combination, do not disclose all of the limitations of the claims. As discussed, Takahashi does not disclose all of the limitations of base claims from which Claims 4, 5, 17, 18, 30 and 31 depend. However, the Patent Office attempts to modify Takahashi based on Mitani to reject the claims.

It is well settled that in order for a modification or combination of the prior art to be valid, the prior art itself must suggest the modification or combination, "...invention cannot be found obvious unless there was some explicit teaching or suggestion in the art to motivate one of ordinary skill to combine elements so as to create the same invention." *Winner International Royalty Corp. v. Wang*, No. 96-2107, 48 USPQ.2d 1139, 1140 (D.C.D.C. 1998) (emphasis added). "The prior art must provide one of ordinary skill in the art the motivation to make the proposed molecular modifications needed to arrive at the claimed compound." *In re Jones*, 958 F.2d 347, 21 USPQ.2d 1941, 1944 (Fed. Cir. 1992) (emphasis added). There is no motivation or suggestion in either reference to combine them.

Even if the modification was legally justified, it still would not render Applicants' claimed invention obvious. The Patent Office admits that Takahashi does not teach all limitations in Claims 4, 5, 17, 18, 30 and 31. Therefore, the Patent Office attempts to modify Takahashi in order to teach Applicant's claimed invention. However, as discussed, there is no teaching in Takahashi of the claimed limitations. It is respectfully submitted that such an

argument by the Patent Office does not meet its burden of establishing a prima facie case of obviousness. The effort required to combine the teachings of Takahashi and Mitani would require a substantial undertaking and numerous elements which would not be obvious. The Patent Office is improperly using “hindsight” and the teachings of Applicant’s own claimed invention in order to combine references to render Applicant’s claims obvious. The Patent Office Action admits that Takahashi fails to teach all of the limitations of Applicant’s claimed invention. However, the Office Action improperly attempts to modify Takahashi in an attempt to achieve Applicant’s claimed invention. For at least these reasons and the additional reasons provided below, rejection of Claims 4, 5, 17, 18, 30 and 31 should be withdrawn.

**As per Claims 4 and 5**, as the Patent Office also states, Takahashi does not disclose generating the user interface by associating a reference with the device information of each of the devices connected to the network. As the Patent Office further acknowledges, Takahashi does not disclose that the information in each device comprises an HTML page contained in that device, as required by Claim 4. Further, As the Patent Office further acknowledges, Takahashi does not disclose displaying the user interface on a browser on a device capable of displaying a user interface, as required by Claim 5.

However, the Patent Office concludes that Mitani, col. 6, line 4 to col. 7, line 12, discloses such limitations of Claims 4 and 5. Further, the Patent Office proposes a modification of Takahashi to include hyper-text link HTML pages that allow user interaction and control of

devices via the Internet. Rejection of the claims is respectfully traversed because the references, alone or in combination, do not teach or suggest the claimed limitations. No prima facie case of obviousness has been established.

Mitani, col. 6, line 4 to col. 7, line 12, (relied upon by the Patent Office), does not disclose generating a user interface nor does Mitani disclose generating such a user interface by associating a hyper-text link with the device information in each of said devices currently connected to the network. Indeed, Mitani only mentions that HTML-form GUI data are received by a control unit 11 from a TV receiver 5 upon request. There is no teaching in Mitani of associating a hyper-text link with the device information of each of said devices currently connected to the network.

One of ordinary skill in the art would not look to combine Takahashi and Mitani. Nor is there a motivation or suggestion in either reference to do so. Even if Takahashi and Mitani are combined as suggested by the Patent Office, the result does not teach or suggest the claimed invention. Further, such a combination would simply mean the multimedia controller of Takahashi receiving HTML data from devices. This provides no advantage for the purpose of Takahashi because the controller is dedicated to control the devices, and remote control via the Internet is not needed nor possible. Takahashi is simply not concerned with, nor is appropriate for, the Patent Office's proposed modification to allow Takahashi's devices to interface with Internet, from service providers, via HTTP protocol. At any rate, such a modified system does

not teach the claimed invention herein. Indeed, such a modified system teaches away from the claimed invention herein because

**As per Claim 4**, Mitani does not disclose that the information in each device comprises an HTML page contained in that device. Further, as discussed, there is no motivation or use in combining Takahashi and Mitani, and such a combination does not teach the claimed invention herein. As such, rejection of Claim 4 should be withdrawn.

**As per Claim 5**, Mitani does not disclose displaying the user interface on a browser on a device connected to the network, capable of displaying a user interface, as required by Claim 5. Further, for the reasons above, one of ordinary skill in the art would not look to the cited references, or to combine them, to achieve the claimed invention herein. As such, rejection of Claim 5 should be withdrawn.

**Claims 17 and 30** were rejected for the same reasons as Claim 4. The rejection of Claims 17 and 30 is respectfully traversed for the reasons given above in relation to Claim 4.

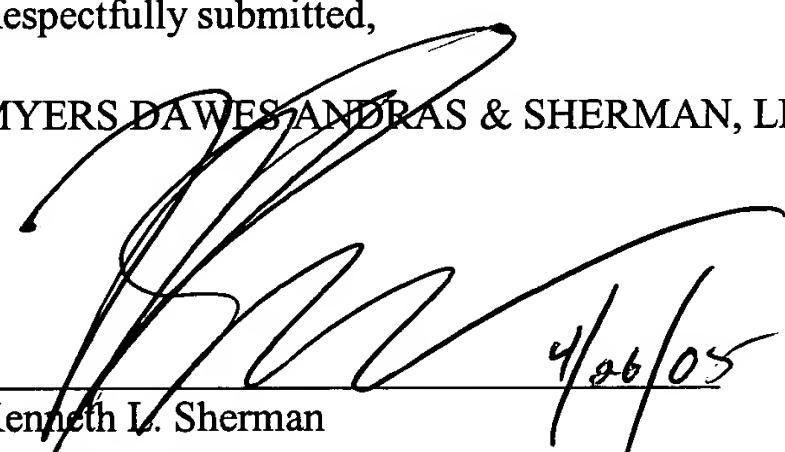
**Claims 18 and 31** were rejected for the same reasons as Claim 5. The rejection of Claims 18 and 31 is respectfully traversed for the reasons given above in relation to Claim 5.

**CONCLUSION**

Accordingly, Applicants respectfully request that the rejections of the claims be withdrawn, and the claims, be allowed for at least the aforementioned reasons. If it is believed that a telephone interview will help further the prosecution of this case, Applicants respectfully request that the undersigned attorney be contacted at the listed telephone number.

Respectfully submitted,

MYERS DAWES ANDRAS & SHERMAN, LLP

  
Kenneth L. Sherman  
Reg. No. 33,783  
19900 MacArthur Blvd., 11<sup>th</sup> Floor  
Irvine, CA 92612  
(949) 223-9600  
Customer No.: 23386

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Sarah A. Nielsen  
(Name of person mailing paper)

Sarah A. Nielsen  
(Signature of person mailing paper)